

Exhibit 2

From: [DeLuca, Justin](#)
To: [J. Bryan Wood](#)
Cc: [Hayes, John](#); [Proctor, Darcy](#); [Kostopulos, Margaret](#); [Ryan O. Estes](#); ["Quinton Osborne"](#); [Benjamin D. Coate](#)
Subject: RE: Nelson et al. v. Pace et al. - Urgent Requests
Date: Monday, November 12, 2018 8:54:24 AM

Bryan,

To follow up on your e-mail, please let me know if there is an alternative date for you to present your motion.

As to the discovery issues, again, we will not agree to the number and scope of the search terms you provided to us, even with your revised search parameters.

With regards to the personnel files, we will not object to the production of these documents. However, given the large volume of files, we will try and produce all of the files of current Pace employees by the end of this month, dependent on the size of these files. As for the personnel files of all employees from 2011 who are not currently employed, that will need additional time and we will try to produce those by the end of December, again dependent on the size of the files and the sheer volume of the documents requested.

Please let me know if you have any questions.

Thanks,

Justin

Justin DeLuca, Attorney at Law



140 South Dearborn Street, 6th Floor
Chicago, IL 60603
Direct Dial: 312.604.9149
Telephone: 312.782.7606
Fax: 312.782.0943
jdeluca@ancelglink.com
www.ancelglink.com

From: J. Bryan Wood [mailto:bryan@jbryanwoodlaw.com]
Sent: Sunday, November 11, 2018 10:01 PM
To: DeLuca, Justin
Cc: Hayes, John; Proctor, Darcy; Kostopulos, Margaret; Ryan O. Estes; 'Quinton Osborne'; Benjamin D. Coate
Subject: Nelson et al. v. Pace et al. - Urgent Requests
Importance: High

J –

Per Judge Lee's orders, we're required to confer about all motions. Please let us know whether Defendants' oppose the attached motion for leave to file our Second Amended Complaint.

We plan to notice the motion for Thursday, November 15 (and have non-deposing attorneys handle any appearance that may be necessary). If that won't work for Defendants, please let us know.

We asked for a definitive position on the discovery issues relating to email and personnel files, but did not receive one. We understand Defendants have not agreed to Plaintiffs requests on either issue. If that's incorrect, please let us know immediately.

Best regards,

Bryan

J. BRYAN WOOD
THE WOOD LAW OFFICE, LLC
303 W. MADISON STREET, SUITE 2650
CHICAGO, ILLINOIS 60606
PHONE: 312-554-8600
FAX: 312-577-0749
E-MAIL: BRYAN@JBRYANWOODLAW.COM
WWW.JBRYANWOODLAW.COM



This transmission (including attachments) is intended for the sole use of the named addressee(s) and may contain information that is privileged, confidential or otherwise exempt from disclosure. If you are not a named addressee or responsible for delivering this transmission to the named addressee, you are not authorized to use, read, print, retain, copy or disseminate any part of this transmission. If you have received this transmission in error, please notify me immediately, discard all paper copies and delete any electronic files of the message. Thank you.

The information contained in this communication is confidential, may be attorney-client privileged, may constitute privileged information, and is intended only for the use of the addressee. It is the property of Ancel, Glink, Diamond, Bush, DiCianni & Krafthefer, P.C. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please do not read it and notify us immediately by return e-mail at jdeluca@ancelglink.com. We may ask you to destroy this communication and all copies thereof, including all attachments.